

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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In re: Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 2666  
(JNE/DTS)

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This Document Relates to All Actions

**NOTICE OF MOTION AND MOTION  
FOR RULE 11 SANCTIONS**

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PLEASE TAKE NOTICE that the undersigned will bring Plaintiffs Motion for Rule 11 Sanctions, for a hearing before the Honorable Judge David T. Schultz of the above named court, on July 16, 2019, at 9:00 a.m. or as soon thereafter as counsel may be heard.

This motion is brought pursuant to pursuant to Rule 11(b) of the Federal Rules of Civil Procedure, and is based on Plaintiffs' Memorandum of Law in Support of Motion; the Affidavit of Genevieve M. Zimmerman; Affidavit of Kyle W. Farrar; the Affidavit of Gabriel Assaad; the Affidavit of Albert Garcia III; the exhibits, files, and records herein; and argument to be presented at the hearing of this matter.

Respectfully submitted,

Dated: July 2, 2019

MESHBESHER & SPENCE LTD.

KENNEDY HODGES, LLP

/s/ Genevieve M. Zimmerman  
Genevieve M. Zimmerman (MN #330292)

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